

ORIGINAL  
IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

2019 DEC -3 AM 11:47

IN RE:

\$14,004.00 IN U.S. CURRENCY

DEPUTY CLERK 

Misc. Case No. 19-MC- 101-S

**AGREED MOTION TO EXTEND  
TIME TO FILE JUDICIAL FORFEITURE ACTION**

The United States of America, through Assistant United States Attorney, Gregory S. Martin, move, pursuant to 18 U.S.C. § 983(a)(3)(A), for a 30-day extension of time to file a judicial action regarding property to which Norman Huynh, through his attorney, Brittany Redden, has filed a claim in an administrative forfeiture proceeding with the Drug Enforcement Administration (DEA), and in support state:

1. DEA seized \$14,004.00 in U.S. Currency on or about June 18, 2019, at DFW International Airport in Tarrant County, Texas.
2. DEA sent written notice of intent to forfeit the seized property to all potentially interested parties as required by 18 U.S.C. § 983(a)(1)(A). On September 4, 2019, Huynh, through his attorney of record, filed a claim to the property with the DEA.
3. No other person has filed a claim to the property, and the time to do so under 18 U.S.C. § 983(a)(2)(A)-(E) has expired.
4. According to 18 U.S.C. § 983(a)(3)(A)-(C), the United States is to file a judicial forfeiture action no later than 90 days after a claim has been filed or return the

seized property pending such filing, except that a court may extend the filing period for good cause shown or upon agreement of the parties.

5. Unless the court extends the judicial filing deadline for good cause or upon agreement of the parties, the 90-day period that began with Huynh' claim expires on December 3, 2019.

6. The parties have agreed to extend the time for filing a judicial action for 30 days, to and including January 2, 2020.

### **CONCLUSION**

Therefore, the parties request an order to extend the filing period for a judicial forfeiture action to and including February 1, 2020.

Respectfully submitted,

ERIN NEALY COX  
UNITED STATES ATTORNEY

/s/ Gregory S. Martin  
GREGORY S. MARTIN  
Assistant United States Attorney  
California Bar No. 294482  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214-659-8600  
Facsimile: 214-659-8803  
E-mail: [gregory.martin2@usdoj.gov](mailto:gregory.martin2@usdoj.gov)

**CERTIFICATE OF CONFERENCE**

I certify that the claimant and the attorney for the claimant have previously agreed to extend the deadline to file a civil forfeiture complaint or include the property in a criminal action as requested.

/s/ Gregory S. Martin  
GREGORY S. MARTIN  
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE:

\$14,004.00 IN U.S. CURRENCY,

Misc. Case No. 19-MC-

**ORDER EXTENDING TIME  
TO FILE JUDICIAL FORFEITURE ACTION**

Before the court is the United States' agreed motion to extend the time to file a judicial forfeiture action \$14,004.00 in U.S. Currency seized from claimant Norman Huynh, on or about June 18, 2019 at DFW International Airport in Tarrant County, Texas. The United States and Huynh have agreed to extend the current deadline of December 3, 2019. No other parties made a claim to the property during the administrative forfeiture proceeding.

The court being authorized by 18 U.S.C. § 983(a)(3)(A) to extend the time in which the United States is required to file a complaint for forfeiture against the property or obtain an indictment alleging that the property is subject to forfeiture based upon agreement of the parties; it is

ORDERED, pursuant to 18 U.S.C. § 983(A)-(C), that the date by which the United States is required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture is extended to January 2, 2020.

---

UNITED STATES DISTRICT JUDGE